

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NEDRA JONES,)	
)	
Plaintiff,)	
)	05CV2909
v.)	
)	Judge Aspen
EMMIT Q. HOOSMAN,)	Magistrate Schenkier
)	
Defendant.)	

AFFIDAVIT OF CAREY M. STEIN IN SUPPORT OF
PLAINTIFF'S MOTION FOR COSTS PURSUANT TO FRCP RULE 4(d)

The affiant, CAREY M. STEIN, being first duly sworn on oath, deposes and states as follows:

1. I am a partner in the law firm of Ashman & Stein, counsel of record for Plaintiff herein. My business address is 150 North Wacker Drive, Suite 3000, Chicago, Illinois 60606. I am a member of the bar of the Illinois Supreme Court and the Federal District Court for the Northern District of Illinois, in addition to being a member of the Federal Trial Bar. I am admitted to practice before numerous other federal and state trial and appellate courts, as well as the United States Supreme Court. I make this affidavit in support of Plaintiff's motion for costs pursuant to FRCP Rule 4(d).

2. On May 17, 2005, I mailed to Emmitt Hoosman: (i) a Notice of Lawsuit and Request For Waiver of Service of Summons, together with (ii) two (2) copies of a "Waiver of Service of Summons" form, (iii) a copy of the Complaint herein, and (iv) a self-addressed stamped envelope.

3. On July 29, 2005, after Defendant failed or refused to return a waiver of service



herein, I caused summons to be issued by Clerk of this Court and thereupon retained Professional's Detective Agency, Inc. to serve same upon Defendant.

4. I keep time and expense records on a daily basis for professional services rendered to clients. Based upon my review of our records, I devoted approximately 1.0 hours to preparing and mailing the request for waiver of summons and then obtaining, preparing and effecting service of summons on Defendant; and .5 hours preparing and filing Plaintiff's motion for costs pursuant to Rule 4(d).

5. My fee for the foregoing work was \$380.00/hour, which is my current billing rate for all types of cases.

6. I have full knowledge of all matters stated herein, and I am competent to testify thereto. If I were called to give testimony during a hearing, my testimony would be in accord with the facts as stated by me herein.

THE AFFIANT FURTHER SAYETH NOT.



CAREY M. STEIN

Subscribed and Sworn to before me

this 24th day of January, 2006


NOTARY PUBLIC

